

## EXHIBIT B

**DECLARATION OF STUART H. SINGER IN SUPPORT OF PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION FOR  
PARTIAL SUMMARY JUDGMENT ON STATE LAW CLAIMS LIMITED TO INTRASTATE ACTIVITY**

1

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

5 IN RE: CATHODE RAY TUBE (CRT) )  
6 ANTITRUST LITIGATION ) Case No. 07-5944 SC  
6 \_\_\_\_\_ )  
7 ) MDL No. 1917  
7 This Document Relates to: )  
8 )  
8 ALL ACTIONS )  
9 )  
9 \_\_\_\_\_ )

HIGHLY CONFIDENTIAL TRANSCRIPT  
ATTORNEYS' EYES ONLY  
VIDEOTAPED DEPOSITION OF  
ANGUS ANTHONY BRYAN

14 TAKEN ON BEHALF OF: THE SAMSUNG DEFENDANTS  
15 PURSUANT TO: NOTICE OF DEPOSITION  
16 DATE TAKEN: THURSDAY, AUGUST 7, 2014  
17 TIME: 9:21 A.M. - 4:39 P.M.  
18 PLACE: BOIES, SCHILLER & FLEXNER, LLP  
401 EAST LAS OLAS BOULEVARD  
SUITE 1200  
FT. LAUDERDALE, FLORIDA  
20  
21 TAKEN BEFORE: NINETTE BUTLER, RPR, CRR, FPR,  
REALTIME SYSTEMS ADMINISTRATOR  
AND NOTARY PUBLIC

1 shelf systems, turntables, receivers, things of that  
2 nature.

3 Q. No CRT products.

4 A. Very little but on occasion.

5 Q. When you were dealing with CRT products, was  
6 that something that was outside of what you understood  
7 to be your daily responsibilities? For example, you  
8 were filling in for someone else who was usually  
9 responsible for that?

10 A. No. If I was selling a home theater system to  
11 someone, I may sell them the entire package, including  
12 the TV, in that respect.

13 Q. And how long were you in that role as sales  
14 employee responsible for audio equipment?

15 A. About a year and a half.

16 Q. So about mid 1991 --

17 A. Uh-huh.

18 Q. -- you switched roles.

19 A. Switched to -- yes.

20 Q. What was your new job?

21 A. Corporate trainer.

22 Q. Was that the title, corporate trainer?

23 A. Yes.

24 Q. Okay. And in what location did you work in  
25 that job?

1           A.     The headquarters, which was at the time in  
2         Miami.

3           Q.     And what did you do in that job?

4           A.     Worked really as a liaison between the buying  
5         office and the retail floor, so would work with the  
6         buying staff, find out what information was relevant to  
7         them to get to the sales staff, go and work with the  
8         salespeople, train them on the products, you know, help  
9         the management team there, and then go back and meet  
10        with the buyers and discuss what things we did during  
11        the week.

12          Q.     I think for me to understand that, I probably  
13        need to know a little bit more about how the company was  
14        structured. So I just want to ask a couple of follow-up  
15        questions about what you said.

16           You said that you were responsible for sort of  
17        coordinating between the buying office and the people on  
18        the sales floor. What was the buying office?

19          A.     The buying office would be the merchants who  
20        were responsible for buying product to bring them into  
21        the company and make them available for resale.

22          Q.     And was that a team of people that was located  
23        in a particular location?

24          A.     Yes.

25          Q.     And was that the headquarters where you were